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Attorneys for Plaintiffs
CARMEL GARCIA, M.Y. AND L.Y., minors by
and through their guardian ad litem VANESSA
RUIZ; L.Y., a minor by and through his guardian
ad litem FRANCISCA URIOSTEGUI

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CARMEL GARCIA, an individual; M.Y. AND L.Y., minors by and through their guardian ad litem VANESSA RUIZ; L.Y., a minor by and through his guardian ad litem FRANCISCA URIOSTEGUI.

Plaintiff,

V.

YUBA COUNTY SHERIFF'S
DEPARTMENT; YUBA COUNTY
SHERIFF'S DEPUTIES DOES 1-5; CITY OF
VACAVILLE; and VACAVILLE POLICE
OFFICER DOES 6-10;

Defendants.

Case No. 2:19-cv-02621-KJM-DB

**FIFTH STIPULATED REQUEST TO CONTINUE
PRE-TRIAL DEADLINES; ORDER**

Judge: Kimberly J. Mueller

1 WHEREAS, Plaintiffs CARMEL GARCIA, M.Y. AND L.Y., minors by and through their
2 guardian ad litem VANESSA RUIZ; L.Y., a minor by and through his guardian ad litem FRANCISCA
3 URIOSTEGUI, (“Plaintiffs”) initiated this case on March 11, 2020 (Dkt. No. 1.1);

4 WHEREAS, Plaintiffs named the CITY OF VACAVILLE, JULIE BAILEY, CHUCK BAILEY,
5 DUSTIN WILLIS, and DAVE SPENCER as Defendants (collectively, “Defendants”);

6 WHEREAS, on February 11, 2022, the Parties filed a fourth stipulation to continue pre-trial
7 deadlines (Dkt. No. 57) because there were discovery delays and a delay in processing the Parties’
8 requests for reports and tissue samples from the Coroner’s Office, which required a Court order.

9 WHEREAS, on February 15, 2022, the Court issued an order regarding the reports and tissue
10 samples from the Coroner’s Office (Dkt. No. 58) and on February 16, 2022, the Court issued an order
11 granting the Parties’ stipulated request to continue pretrial deadlines. (Dkt. No. 59);

12 WHEREAS, the Court’s amended scheduling order set the non-expert discovery deadline for June
13 10, 2022;

14 WHEREAS, the Parties have worked diligently to complete discovery by the deadline of June 10,
15 2022;

16 WHEREAS, the Parties are working together to schedule depositions, but several depositions
17 have yet to be taken, most of which were scheduled and noticed for the week of May 30, 2022.

18 WHEREAS, on May 23, 2022, contacted Plaintiffs’ counsel contacted Defendants’ counsel and
19 stated that he was called into a trial in Los Angeles Superior Court, Case Number BC663663, and that
20 the trial is expected to last 2 to 3 weeks;

21 WHEREAS, due to Plaintiffs’ counsel trial assignment and unavailability, the Parties will be
22 unable to complete the remaining depositions before the June 10, 2022 deadline;

23 WHEREAS, this stipulation is not made for any improper purpose and will not prejudice any
24 party; and

25 WHEREAS, the requested modifications will not otherwise impact the trial date for the case as
26 none has been set.

27 **STIPULATION**

28 NOW, THEREFORE, Plaintiffs and Defendants stipulate and request the court continue presently

set pre-trial dates as follows:

Event	Current Deadline	Proposed Deadline
Discovery Cutoff	June 10, 2022	July 25, 2022
All Dispositive Motions Hearing Date	August 19, 2022	October 3, 2022
Expert Disclosures	September 16, 2022	October 31, 2022
Supplemental Experts	September 30, 2022	November 14, 2022
Completion of Expert Discovery	October 28, 2022	December 12, 2022

Dated: May 31, 2022

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

By: _____ /s/

Richard W. Osman

Attorney for Defendants

CITY OF VACAVILLE, JULIE BAILEY,
CHUCK BAILEY, DUSTIN WILLIS, and DAVE
SPENCER

Dated: May 31, 2022

LAW OFFICES OF FULVIO F. CAJINA

By: _____ /s/

Fulvio F. Cajina

Attorney for Plaintiffs

CARMEL GARCIA, M.Y. AND L.Y., minors by and through their guardian ad litem VANESSA RUIZ; L.Y., a minor by and through his guardian ad litem FRANCISCA URIOSTEGUI

ELECTRONIC CASE FILING ATTESTATION

I, Richard W. Osman, hereby attest that I have on file all holograph signatures for any signatures indicated by a conformed signature ("s") within this E-filed document or have been authorized by counsel to show their signature on this document as /s/.

Dated: May 31, 2022

By: /s/

Richard W. Osman

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

The pre-trial deadlines are continued as follows:

Event	Current Deadline	Proposed Deadline
Discovery Cutoff	June 10, 2022	July 25, 2022
All Dispositive Motions Hearing Date	August 19, 2022	October 21, 2022
Expert Disclosures	September 16, 2022	October 31, 2022
Supplemental Experts	September 30, 2022	November 14, 2022
Completion of Expert Discovery	October 28, 2022	December 12, 2022

DATED: June 6, 2022.

CHIEF UNITED STATES DISTRICT JUDGE